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December 3, 2002

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-314 – Application of Qwest Communications International Inc. for Authorization to Provide In-Region, InterLATA Service in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits this filing at the request of Commission staff to respond to an *ex parte* filed by WorldCom on December 2, 2002, regarding EDI CMP “Event Notifications.”

WorldCom’s December 2 *ex parte* identifies nine Event Notifications¹ (representing seven issues) as examples of alleged deficiencies in Qwest’s EDI interface. Most of the notifications submitted by WorldCom pertain to a new software release of Interconnect Mediated Access (IMA) – version 11.0 – for both GUI and EDI. As with *any* software release, “bugs” or errors may occur when implementing that software. Qwest’s existing CMP recognizes this and therefore utilizes an extensive help-desk ticket and notification process that was developed and agreed to by CLECs and Qwest. This process was described in detail in the Qwest I and Qwest II Applications.²

¹ Two of these Event Notifications, however, pertained to the same issue (busy tone when calling the Wholesale Systems Helpdesk). See Ticket Number 6089759 (November 18, 2002) and Event Notification dated November 14, 2002 (does not list a Ticket Number). Two other Event Notifications also pertained to the same issue (unable to submit Supp 2 LSRs). See Ticket Number 6089625 (November 18, 2002) and Ticket Number 6089625 (November 19, 2002). As a result, the nine Event Notifications submitted by WorldCom identify seven issues.

² See Declaration of Lynn M V Notarianni and Christie L. Doherty, Operations Support Systems, WC Docket No. 02-189 (“Qwest II OSS Decl.”), at ¶¶ 621-627; Declaration of Lynn M V Notarianni and Christie L. Doherty, Operations Support Systems, WC Docket No. 02-148 (“Qwest I OSS Decl.”), at ¶¶ 637-642. See also Declaration of Dana L. Filip, Change Management, WC Docket No. 02-189 (Qwest II), at ¶¶ 86-91.

WorldCom's December 2 *ex parte* leaves out the fact that each of the seven issues related to the Event Notifications WorldCom submitted has been resolved. Specifically, three of the Event Notifications submitted by WorldCom (representing two of the seven issues) were in fact "Closure Notifications" indicating that an issue had been – or would soon be – fixed.³ The remaining six Event Notifications submitted by WorldCom (representing five issues) also have been successfully resolved, and Closure Notifications have been sent for each.⁴ Regardless, in all cases, WorldCom was notified when each situation was discovered by or reported to Qwest, and WorldCom was notified of subsequent resolution and fix dates when this information became available.

WorldCom's claim that these Event Notifications amount to evidence of deficiencies in Qwest's EDI interface is belied by the fact that none of these Event Notifications had a "critical" impact, as that term is defined by the CMP, on CLEC operations. Qwest adheres to CMP-defined severity-level categories when it assigns severity levels to Wholesale Systems Help Desk ("WSHD") tickets.⁵ The severity levels, as they are determined in the CMP, may be summarized as follows:

- **Severity 1 -- Critical Impact:** Trouble tickets for this severity level are critical, highly visible, affect a large number of orders or multiple CLECs, have major impact on revenue, no viable or productive work arounds are available, or entail a major loss of functionality.
- **Severity 2 – Serious Impact:** Trouble tickets for this severity level are serious, moderately visible, affect a moderate to large number of CLECs or orders, limits use of a product or component, or problems may have a possible bypass.
- **Severity 3 -- Moderate Impact:** Trouble tickets for this severity level have low to medium visibility, affect only a single CLEC, have little impact on revenue, entails a minimal loss of functionality, or the problem may be bypassed.
- **Severity 4 – Minimal Impact:** Trouble tickets for this severity level have low or no visibility, no direct impact on a CLEC, impairs only a few functions, or the problem can be bypassed.

³ See Ticket Number 6089759 (November 18, 2002) and Event Notification dated November 14, 2002 (does not list a Ticket Number) and Ticket Number 6088418 (November 15, 2002).

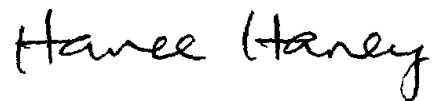
⁴ A "Closure" Notification for each example cited by WorldCom is attached. The three Event Notifications discussed in the preceding footnote were actually Closure Notifications that, for reasons unclear to Qwest, WorldCom included in its December 2 *ex parte*.

⁵ See Change Management Framework at § 12.5, Qwest III Reply Exhibit DLF-1.

Notably, none of the Event Notifications submitted by WorldCom reflect a Severity 1 issue. Only five Event Notifications related to Severity 2 issues, but they represented only three issues.⁶ Moreover, of these three issues, two were resolved by Qwest within five hours⁷ and the third was resolved by Qwest within six days, with a workaround in effect the day after Qwest received notice of the trouble.⁸ The remaining four Event Notifications submitted by WorldCom related to Severity 3 and Severity 4 issues. But, as the attached chart demonstrates, each of these issues also has been successfully resolved. CMP procedures permit CLECs to challenge Qwest's assignment of severity levels to Event Notifications, but WorldCom did not challenge any of the severity levels assigned to the Event Notifications it included in its *ex parte*.⁹ In short, to the extent the Event Notifications cited by WorldCom had any impact on CLECs, it was minimal and clearly not indicative of an EDI deficiency.

The twenty-page limit does not apply to this filing.

Respectfully submitted,



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⁶ See *supra*, note 1.

⁷ See Ticket Number 6089759 (November 18, 2002) and Event Notification dated November 14, 2002 (does not list a Ticket Number).

⁸ See Ticket Number 6089676 (November 19, 2002).

⁹ See Change Management Framework at § 12.5, Qwest III Reply Exhibit DLF-1; Technical Escalation Process, Qwest II Exhibit DLF-CMP-8.